

ORIGINAL

CC '05
OBC
MSG
Pub

RECEIVED

2015 APR 14 PM 4:18

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

FEDERAL MARITIME COMMISSION

DOCKET NO. 14-04

EDAF ANTILLAS, INC.

v

CROWLEY CARIBBEAN LOGISTICS, LLC;
IFS INTERNATIONAL FORWARDING, S.L., and
IFS NEUTRAL MARITIME SERVICES

**SUPPLEMENTAL BRIEF OF RESPONDENT CROWLEY
CARIBBEAN LOGISTICS, LLC ON THE MATTER OF ATTORNEY'S FEES**

Pursuant to the Commission's Order of March 17, 2016, Respondent Crowley Caribbean Logistics, LLC ("CCL") submits this brief regarding the Presiding Officer's award of attorney's fees to CCL in the above-captioned matter

CCL believes that the Presiding Officer's award to CCL is fully consistent with the Commission's new regulations concerning attorney's fees. As provided for in those new rules, the award (1) allows fees only for work done by counsel for CCL on and after the date of the statutory amendments made by the Howard Coble Coast Guard and Maritime Transportation Act of 2014, Pub L. No. 113-282, § 402, 128 Stat. 3022 (Dec. 18, 2014), and (2) properly finds that CCL was an entirely prevailing party, given that the Complaint was dismissed in its entirety after Complainant stopped participating in the proceeding and declined to answer any of the motions filed by CCL (including the motion for fees), as well as the Presiding Officer's Order to Show Cause why Complainant should not be held in default.

CONCLUSION

For the foregoing reasons, CCL requests that the Commission affirm the Presiding Officer's award

Dated April 14, 2016

Respectfully submitted,

BY. 

ERIC C. JEFFREY

NIXON PEABODY LLP

799 Ninth Street, NW

Washington, DC 20001

(202) 585-8000

Counsel for Crowley Caribbean Logistics, LLC

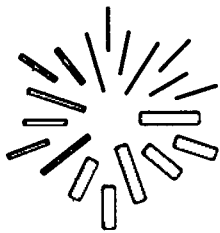
Certificate of Service

I hereby certify that I have this day served the foregoing document upon all parties of record by causing a copy to be mailed to each person.

Dated at Washington, DC, this 14th day of April, 2016

A handwritten signature in black ink, appearing to read "Eric C. Jeffrey", is written over a horizontal line.

Eric C. Jeffrey
Counsel for Crowley Caribbean Logistics, LLC



**NIXON
PEABODY**

RECEIVED
2016 APR 14 PM 4:16
NIXON PEABODY LLP
ATTORNEYS AT LAW
NIXONPEABODY.COM
@NIXONPEABODYLLP
OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

Eric C Jeffrey
Counsel
ejeffrey@nixonpeabody.com

Nixon Peabody LLP
799 9th Street NW
Suite 500
Washington, DC 20001-4501
202-585-8000

April 14, 2016

VIA FIRST CLASS MAIL

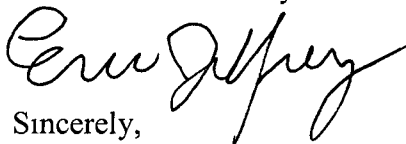
The Hon. Karen V Gregory
Secretary of Federal Maritime Commission
800 North Capitol St.
Room 1046
Washington, D C 20573

Re Edaf Antillas, Inc v Crowley Caribbean Logistics, LLC, IFS International Forwarding,
S.L , and IFS Neutral Maritime Services, Docket No 14-04

Dear Ms Gregory:

Enclosed for filing are an original true copy and five (5) additional copies of the Supplemental Memorandum of Respondent Crowley Caribbean Logistics, LLC on the matter of Attorney's Fees.

Please contact me if you have any questions.


Sincerely,

Eric C Jeffrey

Counsel for Crowley Caribbean Logistics, LLC

Enclosure